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7 | Attorneys for Google LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

1 GOOGLE LLC,
2 Plaintiff,
3 vs.
4 SONOS, INC.,
5 Defendant.

CASE NO. 3:20-cv-06754-WHA
Related to CASE NO. 3:21-cv-07559-WHA

1 I, Jocelyn Ma, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing
 4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this
 5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Sonos, Inc.’s (“Sonos”) Administrative Motion to
 7 Consider Whether Another Party’s Material Should Be Sealed (“Administrative Motion”) (Dkt. No.
 8 176) filed in connection with Sonos’s Motion for Leave to Amend Infringement Contentions (“Motion
 9 to Amend”) (Dkt. No. 177). If called as a witness, I could and would testify competently to the
 10 information contained herein.

11 3. Google seeks an order sealing the materials as listed below:

12 Document	13 Portions Sonos Sought to Be Filed Under Seal	14 Portions Google Seeks to Be Filed Under Seal	15 Designating Party
16 Exhibit B to the Declaration 17 of Geoffrey 18 Moss in Support of Sonos’s 19 Motion to Amend 20 (“Exhibit B”)	Entire 21 Document	Portions outlined in 22 red boxes	Google
23 Exhibit C to the Declaration 24 of Geoffrey 25 Moss in Support of Sonos’s 26 Motion to Amend 27 (“Exhibit C”)	Entire 28 Document	Portions outlined in red boxes	Google

28 4. I understand that the Court analyzes sealing requests for motions for leave to amend
 29 infringement contentions pursuant to the “good cause” standard for non-dispositive motions. *See, e.g.*,
Mediatek Inc. v. Freescale Semiconductor, Inc., No. 11-CV-5341 YGR, 2013 WL 10996547, at *1
 (N.D. Cal. May 10, 2013).

29 5. The portions of Exhibits B and C outlined in red boxes contain references to Google’s
 30 confidential business information and trade secrets, including details regarding source code,
 31 architecture, and technical operation of Google’s products. The specifics of how these functionalities

1 operate is confidential information that Google does not share publicly. Thus, I understand that the
2 public disclosure of such information could lead to competitive harm to Google, as competitors could
3 use these details regarding the architecture and functionality of Google's products to gain a
4 competitive advantage in the marketplace with respect to their competing products. A less restrictive
5 alternative than sealing would not be sufficient because the information sought to be sealed is
6 Google's confidential business information and trade secrets but has been utilized by Sonos in support
7 of Sonos's Motion to Amend.

8 I declare under penalty of perjury under the laws of the United States of America that to the
9 best of my knowledge the foregoing is true and correct. Executed on March 24, 2022, in San
10 Francisco, California.

11 DATED: March 24, 2022

12 By: */s/ Jocelyn Ma*
13 Jocelyn Ma

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